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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 K.A.,

12 Plaintiff,

13 v.

14 MINDGEEK S.A.R.L. a foreign entity;
15 MG FREESITES LTD, a foreign entity;
16 MINDGEEK USA INCORPORATED,
17 a Delaware corporation; MG
18 PREMIUM LTD, a foreign entity; MG
19 GLOBAL ENTERTAINMENT INC., a
20 Delaware corporation; 9219-1568
21 QUEBEC, INC., a foreign entity;
22 BERND BERGMAIR, a foreign
23 individual; FERAS ANTOON, a
24 foreign individual; DAVID
25 TASSILLO, a foreign individual; VISA
26 INC., a Delaware corporation;
27 REDWOOD CAPITAL
28 MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK
CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
COLBECK DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**[PROPOSED] ORDER
GRANTING JOINT
STIPULATION TO REQUEST
(A) EXTENSION OF
REMAINING BRIEFING
SCHEDULE FOR
DEFENDANTS' RESPONSES TO
PLAINTIFF'S SECOND
AMENDED COMPLAINT IN
FLEITES ACTION AND (B)
LIMITED COORDINATION
FOR PURPOSES OF
RESPONDING TO
COMPLAINTS IN RELATED
CASES [ECF NO. 55]**

1 On October 18, 2024, Plaintiff Serena Fleites in *Fleites v. MindGeek S.a.r.l. et*
2 *al.*, Case No. 21-cv-04920-WLH-ADS) (“*Fleites* Action”) and Plaintiffs in the 14
3 Related Actions (collectively, “Plaintiffs”),¹ and Defendants MindGeek S.à r.l, MG
4 Freesites Ltd, MindGeek USA Incorporated, MG Premium Ltd, MG Global
5 Entertainment Inc., 9219-1568 Quebec Inc., Visa Inc., Redwood Capital Management,
6 LLC, Colbeck Capital Management, LLC, Bernd Bergmair, Feras Antoon, and David
7 Tassillo (collectively, “Defendants”) (collectively with Plaintiff, the “Parties”) filed a
8 Joint Stipulation to Request (a) Extension of Remaining Briefing Schedule in *Fleites*
9 Action and (b) Limited Coordination for Purposes of Responding to Complaints in
10 Related Cases (the “Joint Stipulation”).

11 The Court, having considered the Parties’ Joint Stipulation, and finding good
12 cause therefor, hereby GRANTS the Joint Stipulation and ORDERS as follows:

13 (1) in the *Fleites* Action, the deadline for Plaintiff to file a single omnibus
14 opposition to the collective motions to dismiss filed by Defendants is **October 30,**
15 **2024;**

16 (2) in the *Fleites* Action, the deadline for each of the Defendants to file a reply
17 in support of their respective motion to dismiss is **December 6, 2024;**

18 (3) in the 14 Related Actions, the deadline for each of the Defendants to answer,
19 move, or otherwise respond to the complaints is **October 30, 2024;**

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21 _____
22 ¹ The “14 Related Actions” refers to the following cases, which are pending in this
23 Court: *K.A. v. MindGeek S.A.R.L. et al.*, 24-cv-04786; *N.L. v. MindGeek S.A.R.L. et*
24 *al.*, 24-cv-04788; *T.C. v. MindGeek S.A.R.L. et al.*, 24-cv-04795; *X.N. v. MindGeek*
25 *S.A.R.L. et al.*, 24-cv-04800; *N.Y. v. MindGeek S.A.R.L. et al.*, 24-cv-04801; *L.T. v.*
26 *MindGeek S.A.R.L. et al.*, 24-cv-04791; *J.C. v. MindGeek S.A.R.L. et al.*, 24-cv-
27 04971; *W.L. v. MindGeek S.A.R.L. et al.*, 24-cv-04977; *C.S. v. MindGeek S.A.R.L. et*
28 *al.*, 24-cv-04992; *S.O. v. MindGeek S.A.R.L. et al.*, 24-cv-04998; *L.S. v. MindGeek*
S.A.R.L. et al., 24-cv-05026; *W.P. v. MindGeek S.A.R.L. et al.*, 24-cv-05185; *A.K. v.*
MindGeek S.A.R.L. et al., 24-cv-05190; and *J.L. v. MindGeek S.A.R.L., et al.*, 24-cv-
07046.

1 (4) in the 14 Related Actions, the deadline for Plaintiffs to file a single omnibus
2 opposition to all of the Defendants' motions to dismiss is **December 12, 2024**;

3 (5) in the 14 Related Actions, the deadline for each of the Defendants to file a
4 omnibus reply in support of their respective motion to dismiss is **January 8, 2025**; and

5 (6) in the *Fleites* Action and the 14 Related Actions, a hearing is set for
6 Defendants' motions to dismiss on **January 31, 2025**, at _____.

7 IT IS SO ORDERED.

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9 DATED:

By: _____

10 HON. WESLEY L. HSU
11 UNITED STATES DISTRICT JUDGE
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